

BOARDWALK



PIPELINE PARTNERS™

December 16, 2010

Mr. Wayne Lemoi, Director
U S Department of Transportation
Pipeline and Hazardous Materials Safety Administration
233 Peachtree Street, Suite 600
Atlanta, Georgia 30303

Re: CPF 2-2010-1011M

Dear Mr. Lemoi,

Gulf South Pipeline Company, LP Gulf South, received your letter dated November 23, 2010, on November 30, 2010, which provided notification that amendments are needed to satisfactorily correct Gulf South's Operations and Maintenance, Operator Qualification, and Integrity Management Programs. We respectfully request a deadline extension of response date until February 1, 2011 and the compliance date until April 1, 2011. We request this extension for two reasons. First, receipt of the notice of amendment letter was just before the Christmas holidays, when our staffing is at minimal levels. Second, we take the amendments very seriously and, while we do not anticipate contesting any items in the Notice of Amendment, we need to identify not only the implications for our integrity management program but also determine how such amendments may affect our operations and maintenance manuals, operator qualification program, and make changes accordingly. With the upcoming holidays, it will be very difficult for Gulf South to complete this thorough evaluation and make any necessary changes by the current deadlines. If we complete the necessary revisions prior to April 1, we will of course forward them to you immediately upon completion.

Should you have questions or need additional information, please do not hesitate to contact me. Thank you in advance for your consideration in this matter.

Sincerely,

David Goodwin, VP of Compliance and Ops Service

Cc: Walt Bennett, VP of Operations
Frank Maraia, Dir. PL Integrity & Field Engineering
Jack Adams, Dir. Compliance/DOT & Security

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